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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) No. CR 15-00003 VC
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED] ORDER
16 CHRISTOPHER LEE CARIGNAN,) TO CONTINUE MOTION BRIEFING SCHEUDLE
17 Defendant.) AND TO CONTINUE MOTION HEARING
18 _____)

19 The parties in this case stipulate to the government's request for additional time to file its
Opposition to the Defendant's Motion to Suppress Evidence and to continue the date for the motion
hearing, which are made to accommodate government counsel's illness and travel plans. The defendant
has no opposition to the government's request for additional time, and the parties concur that this
modification will extend the time for the defendant to file a reply brief in support of his Motion to
Suppress Evidence. Accordingly, should the Court grant these requests, the parties propose to continue
the briefing schedule and motion hearing date as follows:

20 Government's Opposition Due: July 28, 2015

21 Defendant's Reply Due: August 4, 2015

22 Motion Hearing: August 18, 2015 at 1:00 PM

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24 STIPULATION AND [PROPOSED] ORDER TO CONTINUE
25 MOTION BRIEFING SCHEUDLE AND TO CONTINUE MOTION HEARING
26 CR 15-00003VC

1 The defendant filed his Motion to Suppress Evidence on June 11, 2015, and thus time has been
2 excluded automatically under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(1)(D).

3 Accordingly, for the reasons stated above, the parties jointly move to continue the briefing
4 schedule and to continue the date for the Motion Hearing.

5 SO STIPULATED

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7 DATED: July 7, 2015

MELINDA HAAG
United States Attorney

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10 DATED: July 7, 2015

/s/
SHEILA A.G. ARMBRUST
Assistant United States Attorney

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13 DATED: July 7, 2015

/s/
ELIZABETH FALK
Attorney for Defendant
Christopher Carignan

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[PROPOSED] ORDER

17 For the reasons stated above the Court hereby CONTINUES the date for the government to file
18 an opposition to the Defendant's Motion to Suppress Evidence from July 7, 2015 to July 28, 2015 and
19 CONTINUES the date for the defendant to file a reply in support of his Motion to Suppress Evidence
20 from July 14, 2015 to August 4, 2015. The Court also CONTINUES the date for the hearing on the
21 Motion to Suppress Evidence from July 21, 2015 to August 18, 2015. The Court concurs that, pursuant
22 to 18 U.S.C. § 3161(h)(1)(D), time has been automatically excluded under the Speedy Trial Act to allow
23 the Court to review and rule on a pending motion.

24 IT IS SO ORDERED

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26 DATED: July 9, 2015


THE HONORABLE VINCE CHHABRIA
United States District Judge

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28 STIPULATION AND [PROPOSED] ORDER TO CONTINUE
MOTION BRIEFING SCHEDULE AND TO CONTINUE MOTION HEARING
CR 15-00003 VC